

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
NORRIS, McLAUGHLIN & MARCUS, P.A. Morris S. Bauer, Esq. Matteo Percontino, Esq. 400 Crossing Boulevard, 8 th Floor P.O. Box 5933 Bridgewater, New Jersey 08807 (908) 722-0700 mbauer@nmmlaw.com mpercontino@nmmlaw.com Proposed Counsel for the Debtor/Debtor-in-Possession	
In Re:	Case No.: 17-
QUALITY CONSERVATION SERVICES, INC.,	Chapter: 11
Debtor.	Judge: Hon.

**NOTICE OF MOTION OF DEBTOR FOR THE ENTRY OF AN ORDER
AUTHORIZING THE DEBTOR TO CONTINUE
INSURANCE COVERAGE ENTERED INTO PREPETITION**

PLEASE TAKE NOTICE that *on the date specified in the Order Regarding Application for Expedited Consideration of First Day Matters*, Quality Conservation Services, Inc., the debtor-in-possession (the “Debtor”), shall move before the Honorable Judges at the United States Bankruptcy Court for the District of New Jersey, Martin Luther King Jr. Building, 50 Walnut Street, 3rd Floor, Newark, New Jersey 07102 for the entry of an order authorizing the Debtor to maintain and continue its insurance policies uninterrupted and to pay any prepetition amounts related to such policies to the extent the Debtor determines, in its discretion, that such payment is appropriate (the “Motion”).

PLEASE TAKE FURTHER NOTICE that the Debtor shall rely upon the Declaration of Samuel Galpin in support of First Day Motions, the Application and Memorandum of Law, and proposed Order filed simultaneously herewith in support of the relief sought.

PLEASE TAKE FURTHER NOTICE that in accordance with D.N.J. LBR 9013-5(d), opposition to the relief requested, if any, may be made at the hearing.

PLEASE TAKE FURTHER NOTICE that any opposition filed to the relief requested shall be filed with the Clerk of the Bankruptcy Court and served upon Norris McLaughlin & Marcus, P.A., Attn: Morris S. Bauer, Esq., 400 Crossing Boulevard, 8th Floor, Bridgewater, NJ 08807.

PLEASE TAKE FURTHER NOTICE that unless objections are timely made, the Motion shall be decided on the papers at the hearing in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-3(a), in the event the Motion is contested, there is a duty to confer to determine whether a consent order may be entered disposing of the Motion or to stipulate to the resolution of as many issues as possible.

PLEASE TAKE FURTHER NOTICE that in accordance with D.N.J. LBR 9013-3(e), unless the Court authorizes otherwise prior to the hearing date hereof, no testimony shall be taken at the hearing except by certification or affidavit.

NORRIS, McLAUGHLIN & MARCUS, PA
Proposed Counsel for Quality Conservation
Services, Inc.

By: /s/ Morris S. Bauer
Morris S. Bauer, Esq.

Dated: May 2, 2017